

**EXHIBIT C TO THE MARCH 19, 2012 DECLARATION OF  
BRAD E. KONSTANDT IN SUPPORT OF DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

GLASS DIMENSIONS, INC., ON )  
BEHALF OF THE GLASS ) Civil Action No.  
DIMENSIONS, INC. PROFIT ) 1:10-CV-10588 (JLT)  
SHARE PLAN AND TRUST, AND )  
ALL OTHERS SIMILARLY )  
SITUATED, )  
Plaintiffs, )  
vs. )  
STATE STREET CORPORATION, )  
STATE STREET BANK & TRUST )  
CO., AND STATE STREET GLOBAL )  
ADVISORS, )  
Defendants. )

VIDEOTAPED DEPOSITION of DARRELL  
R. PERKINS, called as a witness by and on behalf of  
the Defendants, pursuant to the applicable  
provisions of the Federal Rules of Civil Procedure,  
before P. Jodi Ohnemus, RPR, RMR, CRR, CA-CSR  
#13192, NH-CSR #91, MA-CSR #12393, and Notary  
Public, within and for the Commonwealth of  
Massachusetts, at the offices of WilmerHale, LLP,  
60 State Street, Boston, Massachusetts, on  
Wednesday, 15 June, 2011, commencing at 10:07 a.m.

2	1 APPEARANCES: 2 3 4 BAILEY & GLASSER LLP 5 BY: Gregory Y. Porter, Esq. 6 -and- 7 Leona Z. Goldshaw, Esq. 8 910 17th Street NW 9 Suite 800 10 Washington, DC 20006 11 202 463-2111 12 Gporter@baileyglasser.com 13 Lgoldshaw@baileyglasser.com 14 For the Plaintiffs 15 16 17 18 19 20 21 22 23 24	4
3	1 APPEARANCES: (CONT'D) 2 3 WILMER CUTLER PICKERING HALE 4 AND DORR LLP 5 BY: Jeffrey B. Rudman, Esq. 6 60 State Street 7 Boston, MA 02109 8 617 526-6912 9 Jeffrey.rudman@wilmerhale.com 10 -and- 11 Brad Konstandt, Esq. 12 399 Park Avenue 13 New York, NY 10022 14 212 230-8888 15 Brad.konstandt@wilmerhale.com 16 -and- 17 Jeffrey Chang, Esq. 18 1875 Pennsylvania Avenue NW 19 Washington, DC 20009 20 202 663-6307 21 Jeffrey.chang@wilmerhale.com 22 For the Defendants 23 ALSO PRESENT: 24 George Dobrentey, Videographer	5
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<p style="text-align: right;">6</p> <p>1 VIDEO OPERATOR: Good morning. My name is</p> <p>2 George Dobrentey of Veritext, New York. Today's</p> <p>3 date is June 15th, 2011, and the time is 10:07 a.m.</p> <p>4 This deposition is being held at WilmerHale, in</p> <p>5 Boston, Massachusetts.</p> <p>6 The case caption is Glass Dimensions,</p> <p>7 Incorporated versus State Street Corporation, in</p> <p>8 the US District Court for the District of</p> <p>9 Massachusetts, Case No. 1:10-cv-10588. The name of</p> <p>10 the witness is Darrell Perkins.</p> <p>11 Will counsel please introduce themselves;</p> <p>12 and will the court reporter swear in the witness.</p> <p>13 MR. PORTER: Gregory Porter and Leona</p> <p>14 Goldshaw for the Plaintiffs.</p> <p>15 MR. RUDMAN: Jeff Rudman, Jeff Chang, Brad</p> <p>16 Konstandt, for the Defendants.</p> <p>17 DARRELL R. PERKINS, having</p> <p>18 satisfactorily been identified by</p> <p>19 the production of a driver's license,</p> <p>20 and being first duly sworn by the Notary</p> <p>21 Public, was examined and testified as</p> <p>22 follows to interrogatories</p> <p>23 BY MR. RUDMAN:</p> <p>24 Q. For the record, sir, your full name.</p>	<p style="text-align: right;">8</p> <p>1 A. 64, I believe.</p> <p>2 Q. And what is her level -- highest level of</p> <p>3 education?</p> <p>4 A. High school -- maybe some -- a couple of</p> <p>5 courses after that, but I'm not sure.</p> <p>6 Q. So both your parents are high school</p> <p>7 grads?</p> <p>8 A. Yes.</p> <p>9 Q. And what position do they occupy with</p> <p>10 Glass Dimensions?</p> <p>11 A. My father's the president. My mom's the</p> <p>12 treasurer.</p> <p>13 Q. And did your parents essentially found the</p> <p>14 company?</p> <p>15 A. Yes.</p> <p>16 Q. How many employees does the company have?</p> <p>17 A. Right now?</p> <p>18 Q. At the moment, yeah.</p> <p>19 A. Paid? Zero.</p> <p>20 Q. Paid, zero.</p> <p>21 A. (Witness nods.)</p> <p>22 Q. Were there more participants or more</p> <p>23 employees than that at one point?</p> <p>24 A. Yes, 50 at the highest.</p>
<p style="text-align: right;">7</p> <p>1 A. Darrell Richard Perkins.</p> <p>2 Q. Residential address?</p> <p>3 A. 35 Conomo Point Road, Essex, Mass. 01929.</p> <p>4 Q. Do you work for a company?</p> <p>5 A. Yes.</p> <p>6 Q. Named?</p> <p>7 A. Glass Dimensions.</p> <p>8 Q. And what is your title with the company?</p> <p>9 A. CFO, COO.</p> <p>10 Q. And where is Glass Dimensions located,</p> <p>11 please?</p> <p>12 A. 197 Western Avenue, Essex, Mass.</p> <p>13 Q. What is the business of Glass Dimensions?</p> <p>14 A. We make handblown glass giftware.</p> <p>15 Q. What's your father's full name, please?</p> <p>16 A. David Robert Perkins.</p> <p>17 Q. His age?</p> <p>18 A. 66, 67.</p> <p>19 Q. And his highest level of education?</p> <p>20 A. High school.</p> <p>21 Q. What is your mom's full name, please.</p> <p>22 A. Maureen Perkins.</p> <p>23 Q. And what is -- forgive me for being</p> <p>24 ungallant -- but what is her age, please?</p>	<p style="text-align: right;">9</p> <p>1 Q. When was that, please.</p> <p>2 A. '94, '95, I'm guessing.</p> <p>3 Q. What was the employee population, let's</p> <p>4 say, in 1993?</p> <p>5 A. I came on in '97, so I would guess it was</p> <p>6 around 50 in '93. But in '97 it was probably down</p> <p>7 to 20.</p> <p>8 Q. And let's say 2 -- '97, okay. Well, how</p> <p>9 about 2003?</p> <p>10 A. 2003? Down to five maybe, six.</p> <p>11 Q. And you went to Brown College, right?</p> <p>12 A. Uh-huh.</p> <p>13 Q. And you went to Duke for business school?</p> <p>14 A. Correct.</p> <p>15 Q. Does Glass Dimensions currently have a</p> <p>16 pension plan?</p> <p>17 A. No.</p> <p>18 Q. Did it?</p> <p>19 A. Yes.</p> <p>20 Q. When did the pension plan go away?</p> <p>21 A. Within the last few months.</p> <p>22 Q. Within the last few months.</p> <p>23 Where are the proceeds of that pension</p> <p>24 plan now?</p>

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<p style="text-align: right;">118</p> <p>1 Porter?</p> <p>2 A. To supervise Mr. Porter?</p> <p>3 Q. Yes.</p> <p>4 A. I'm not understanding your question.</p> <p>5 Q. All right. Do you understand that Mr.</p> <p>6 Porter is really the only lawyer who's working for</p> <p>7 you in this matter?</p> <p>8 A. I believe there are other attorneys</p> <p>9 working on the case.</p> <p>10 Q. Can you give me their names?</p> <p>11 A. No.</p> <p>12 Q. You -- you can't or you won't?</p> <p>13 A. I can't.</p> <p>14 MR. PORTER: He doesn't --</p> <p>15 A. I don't know the specific names of the</p> <p>16 other attorneys that are working on the case, no.</p> <p>17 Q. Do you know what their fee arrangement is</p> <p>18 with you --</p> <p>19 A. I don't believe --</p> <p>20 Q. -- with Glass Dimensions?</p> <p>21 A. -- believe that we have an arrangement</p> <p>22 with them.</p> <p>23 Q. I see. Do you know if you have an</p> <p>24 arrangement with Mr. Porter that is binding on</p>	<p style="text-align: right;">120</p> <p>1 that; don't you?</p> <p>2 A. One email correspondence -- yeah. I</p> <p>3 wouldn't say that was a role.</p> <p>4 Q. Or more.</p> <p>5 A. And maybe gone to a meeting.</p> <p>6 Q. Oh, you did go to a meeting with State</p> <p>7 Street?</p> <p>8 A. I -- I did.</p> <p>9 Q. Pardon?</p> <p>10 A. Yes.</p> <p>11 Q. When was that?</p> <p>12 A. I don't remember. It was --</p> <p>13 Q. What year?</p> <p>14 A. I don't remember.</p> <p>15 Q. 2005?</p> <p>16 A. Probably later.</p> <p>17 Q. 2006?</p> <p>18 A. I have to guess later, but I'm not sure.</p> <p>19 Q. With whom did you meet at State Street?</p> <p>20 A. As I said, I don't remember. I stated</p> <p>21 that originally when I talked about it.</p> <p>22 Q. And do -- you don't have any memory --</p> <p>23 were your parents with you, or did you meet alone?</p> <p>24 A. Definitely -- no, my parents were there.</p>
<p style="text-align: right;">119</p> <p>1 them?</p> <p>2 A. I do not know.</p> <p>3 Q. Do you know what responsibility you have</p> <p>4 to supervise the other lawyers assisting Mr. Porter</p> <p>5 on this case?</p> <p>6 A. To supervise?</p> <p>7 Q. Yes, to oversee.</p> <p>8 A. I -- I don't -- I don't understand what</p> <p>9 you mean by that.</p> <p>10 Q. So as far as you're concerned, Glass</p> <p>11 Dimensions' obligation in this matter is to tell</p> <p>12 the truth.</p> <p>13 A. Yes.</p> <p>14 Q. Does that include you?</p> <p>15 A. Yes.</p> <p>16 Q. But you didn't even want to be deposed</p> <p>17 today; did you?</p> <p>18 A. Oh, I didn't see the purpose, 'cause I</p> <p>19 wasn't involved for such a long time with the plan;</p> <p>20 and only once we started did I have any reluctance</p> <p>21 -- recollection of any role -- as you call it -- in</p> <p>22 the plan was when we needed to get -- when we</p> <p>23 wanted to take our money out and we couldn't.</p> <p>24 Q. Right. But you know you had a role before</p>	<p style="text-align: right;">121</p> <p>1 Q. Your parents were there. So all three of</p> <p>2 you had a chance to ask any questions you wanted to</p> <p>3 ask of State Street.</p> <p>4 A. As you stated before, yes.</p> <p>5 MR. RUDMAN: I'm going to mark as Exhibit</p> <p>6 9 a plan declaration -- a fund declaration -- for</p> <p>7 the Daily International Alpha Securities Lending</p> <p>8 Fund.</p> <p>9 Madam reporter, if you could kindly mark</p> <p>10 that as Exhibit 9.</p> <p>11 Mr. Porter, that's for you.</p> <p>12 MR. RUDMAN: Madam reporter, if you could</p> <p>13 kindly put Exhibit 9 in front of the witness, I'd</p> <p>14 be grateful.</p> <p>15 (Perkins 9, SS-GD 0000560-563.)</p> <p>16 Q. Now, sir, it is your testimony that the</p> <p>17 Daily International Alpha Securities Lending Fund</p> <p>18 was a fund with which you were -- meaning the</p> <p>19 pension plan was invested.</p> <p>20 A. I believe so, yeah.</p> <p>21 Q. All right. Good.</p> <p>22 Could you turn, please, to the second page</p> <p>23 of Exhibit 9.</p> <p>24 Do you see in the middle of the page the</p>

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<p style="text-align: right;">122</p> <p>1 following words: "Fees and Expenses?"</p> <p>2 Are you with me?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Yes or no?</p> <p>5 A. Yes. Sorry.</p> <p>6 Q. "The fund will be charged custody fees as</p> <p>7 set forth on the attached schedule. The fund will</p> <p>8 also be charged an annual audit fee and such other</p> <p>9 fees as are permitted by the declaration of trust."</p> <p>10 Did I read that right?</p> <p>11 A. I believe so.</p> <p>12 Q. Let me go to the next paragraph: "No less</p> <p>13 than 50 percent of the securities lending revenue</p> <p>14 will accrue to the benefit of the participants of</p> <p>15 the fund."</p> <p>16 Did I read that right?</p> <p>17 A. Yes.</p> <p>18 Q. "As compensation for these securities</p> <p>19 lending services conducted on behalf of the fund,</p> <p>20 the trustee will generally receive a fee of no more</p> <p>21 than 50 percent of the income generated by such</p> <p>22 securities lending activities."</p> <p>23 Did I read that right?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">124</p> <p>1 read that, one would know precisely how State</p> <p>2 Street was being compensated.</p> <p>3 Yes?</p> <p>4 A. It's pretty clear.</p> <p>5 Q. Now, would you agree with me that you</p> <p>6 could have asked to see this document at any time</p> <p>7 you liked?</p> <p>8 A. How would I know how to ask for a document</p> <p>9 that I didn't know existed?</p> <p>10 Q. Well, you knew you were investing with an</p> <p>11 investment firm, right?</p> <p>12 A. (Witness nods.)</p> <p>13 Q. Correct, State Street?</p> <p>14 A. Yes.</p> <p>15 Q. You knew there had to be some paperwork</p> <p>16 for the fund; did you not?</p> <p>17 A. Yes.</p> <p>18 Q. I mean, you were a graduate of the Duke</p> <p>19 business school, correct?</p> <p>20 A. Yes.</p> <p>21 Q. It's called Fuqua?</p> <p>22 A. Correct.</p> <p>23 Q. F-u-q-u-a?</p> <p>24 A. Correct.</p>
<p style="text-align: right;">123</p> <p>1 Q. Do you know who the trustee is?</p> <p>2 A. My understanding is State Street.</p> <p>3 Q. Okay. Your understanding is State Street.</p> <p>4 And if you go back to the first paragraph</p> <p>5 of the document and just look at it quickly, I</p> <p>6 think you will see that it says State Street Bank &amp;</p> <p>7 Trust Company is the trustee.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So you're not in the least confused</p> <p>10 who the trustee was or is, right?</p> <p>11 A. No, sir.</p> <p>12 Q. And you are not in the least confused as</p> <p>13 to how much money the trustee gets for engaging in</p> <p>14 securities lending on behalf of the fund.</p> <p>15 MR. PORTER: Now?</p> <p>16 MR. RUDMAN: Now.</p> <p>17 A. Now? No.</p> <p>18 Q. All right. Would you agree with me it is</p> <p>19 perfectly clear from this declaration -- fund</p> <p>20 declaration.</p> <p>21 MR. PORTER: That being Exhibit No. 9.</p> <p>22 MR. RUDMAN: Exhibit No. 9?</p> <p>23 A. Yeah. If one read that, yes.</p> <p>24 Q. Okay. So you would agree that, if one</p>	<p style="text-align: right;">125</p> <p>1 Q. And do you have an MBA?</p> <p>2 A. Yes.</p> <p>3 Q. So -- and you went to -- I'm sorry. I</p> <p>4 forgot which college.</p> <p>5 A. Brown University.</p> <p>6 Q. You went to Brown.</p> <p>7 What did you major in at Brown?</p> <p>8 A. International relations.</p> <p>9 Q. And what's your MBA in, if it's -- if it's</p> <p>10 specific?</p> <p>11 A. It's not a specific MBA, but I</p> <p>12 concentrated on finance courses.</p> <p>13 Q. Okay. So you concentrated in finance at</p> <p>14 Fuqua, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you do have degrees both from Brown</p> <p>17 and from Fuqua, right?</p> <p>18 A. Correct.</p> <p>19 Q. So you're not an unsophisticated guy; are</p> <p>20 you?</p> <p>21 MR. PORTER: Objection. Argumentative.</p> <p>22 Q. You knew if you invested with a mutual</p> <p>23 fund or a securities lending fund there had to be</p> <p>24 documents describing the operations of the fund,</p>

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<p style="text-align: right;">126</p> <p>1 correct?</p> <p>2 A. Bernie Madoff didn't have any.</p> <p>3 Q. I see. So your belief is that Mr. Madoff</p> <p>4 ran his business exactly as State Street ran his?</p> <p>5 A. I did not say that.</p> <p>6 Q. All right. Would you agree with me, sir,</p> <p>7 that Mr. Madoff wouldn't meet with people and</p> <p>8 wouldn't answer questions?</p> <p>9 A. I have no idea.</p> <p>10 Q. All right. So you don't know how State</p> <p>11 Street is or is not like Mr. Madoff.</p> <p>12 A. None whatsoever.</p> <p>13 Q. And that's just kind of a slur that you'd</p> <p>14 probably like to retract.</p> <p>15 MR. PORTER: Objection.</p> <p>16 A. I have no reason to retract anything.</p> <p>17 Q. I see. So you think State Street is</p> <p>18 equivalent to Bernie Madoff?</p> <p>19 MR. PORTER: Objection. Asked and</p> <p>20 answered.</p> <p>21 A. I never said anything like that.</p> <p>22 Q. Okay. Fine.</p> <p>23 Would you agree with me, sir, that you</p> <p>24 knew that State Street had to have documents that</p>	<p style="text-align: right;">128</p> <p>1 Q. -- documents which governed the investment</p> <p>2 products you were invested in, correct?</p> <p>3 A. I didn't know they existed, but I could</p> <p>4 assume that they existed.</p> <p>5 Q. Okay.</p> <p>6 A. And had I asked for them, I assume it</p> <p>7 would have been given to me.</p> <p>8 Q. If you asked for them, you'd have got 'em,</p> <p>9 right?</p> <p>10 Correct?</p> <p>11 A. Correct.</p> <p>12 Q. So -- and finally, you would agree with me</p> <p>13 that if you had read Exhibit 9 -- which you say you</p> <p>14 didn't -- you'd have known exactly how much you</p> <p>15 were being charged.</p> <p>16 A. Yes.</p> <p>17 MR. RUDMAN: Let's go to Exhibit 10.</p> <p>18 MR. PORTER: How much longer on the tape?</p> <p>19 VIDEO OPERATOR: 15 minutes.</p> <p>20 MR. RUDMAN: We may be done.</p> <p>21 MR. PORTER: Oh, really? Okay.</p> <p>22 MR. RUDMAN: I'm not promising you, but</p> <p>23 I'm trying.</p> <p>24 MR. PORTER: Well, you can't tantalize me</p>
<p style="text-align: right;">127</p> <p>1 governed the investment products they were offering</p> <p>2 the public.</p> <p>3 A. I would assume they would have, yes.</p> <p>4 Q. Yes. And you'd have assumed that in 1997,</p> <p>5 right?</p> <p>6 A. Absolutely.</p> <p>7 Q. All right. And you never asked to see the</p> <p>8 documents governing the products in which you or</p> <p>9 the pension plan or Glass Dimensions itself were</p> <p>10 invested, right?</p> <p>11 A. No, sir.</p> <p>12 Q. No, sir. You knew how to send emails</p> <p>13 asking questions, right?</p> <p>14 A. Quite capable.</p> <p>15 Q. And you knew how to go to meetings at</p> <p>16 State Street, right?</p> <p>17 A. I could find it, yes.</p> <p>18 Q. You knew how to use the telephone.</p> <p>19 A. I'm quite capable.</p> <p>20 Q. Yeah. You knew about things like REITs,</p> <p>21 right?</p> <p>22 A. Uh-huh.</p> <p>23 Q. And you knew that there were --</p> <p>24 A. Yes.</p>	<p style="text-align: right;">129</p> <p>1 like that, Jeff.</p> <p>2 MR. RUDMAN: If that constitutes</p> <p>3 tantalization, you have an Anthony Weiner problem.</p> <p>4 MR. PORTER: All right. Let's go with</p> <p>5 titillation. How about that?</p> <p>6 MR. RUDMAN: Let's mark as Exhibit 10 the</p> <p>7 Amended Fund Declaration for the Active US Small</p> <p>8 Cap Securities Lending Fund.</p> <p>9 Q. Here's my simple question, sir.</p> <p>10 (Perkins 10, SS-GD 0578-581.)</p> <p>11 Q. Here's my simple question to you, sir:</p> <p>12 Would you agree with me that the Active US Small</p> <p>13 Cap Securities Lending Fund was one of the funds</p> <p>14 with which the Glass Dimensions pension plan -- in</p> <p>15 which the Glass Dimensions pension plan was</p> <p>16 invested?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. All right. Would you please turn to the</p> <p>19 second page.</p> <p>20 You will see it says, "Permitted class of</p> <p>21 units, fees, and expenses," right?</p> <p>22 A. Yes.</p> <p>23 Q. Would you turn over to the third page.</p> <p>24 And at the top of the page, do you see the</p>

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<p style="text-align: right;">130</p> <p>1 following words: "No less than 50 percent of the</p> <p>2 securities lending revenue will accrue to the</p> <p>3 benefit of the participants of the fund."</p> <p>4 Did I read that right?</p> <p>5 A. Yes.</p> <p>6 Q. Next sentence: "As compensation for these</p> <p>7 security lending services conducted on behalf of</p> <p>8 the fund, the trustee will generally receive a fee</p> <p>9 of no more than 50 percent of the income generated</p> <p>10 by such security lending activities."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Would you agree with me, sir, that if you</p> <p>14 had seen Exhibit 10 at the time, you would have</p> <p>15 known exactly how much the Small Cap Securities</p> <p>16 Lending Fund was making by virtue of the services</p> <p>17 it was offering?</p> <p>18 MR. PORTER: Objection.</p> <p>19 A. Generally, yeah. I would. This just</p> <p>20 says, "generally receive," but yeah, roughly.</p> <p>21 Q. You would have known the trustee --</p> <p>22 meaning State Street -- was getting roughly 50</p> <p>23 percent of the profits, correct?</p> <p>24 A. That would be my assumption, yes.</p>	<p style="text-align: right;">132</p> <p>1 conducted on behalf of the fund, the trustee will</p> <p>2 generally receive a fee of no more than 50 percent</p> <p>3 of the income generated by such securities lending</p> <p>4 activities."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Would you agree with me that if you had</p> <p>8 read Exhibit 11 at the time, you would have known</p> <p>9 how much money the trustee was generally making?</p> <p>10 A. Roughly, yes.</p> <p>11 Q. You would have known what State Street was</p> <p>12 charging.</p> <p>13 A. Roughly, yes.</p> <p>14 Q. Yes. Okay. No big mystery, right?</p> <p>15 MR. PORTER: Objection. Argumentative.</p> <p>16 Q. Right?</p> <p>17 A. Do I think it's a mystery?</p> <p>18 Q. Well, now that you've read that --</p> <p>19 A. Now that I've read it, it seems pretty</p> <p>20 straightforward.</p> <p>21 Q. Good. Thank you. All right.</p> <p>22 Now, did you provide your counsel with,</p> <p>23 quote, "all documents, other than electronic</p> <p>24 documents, that Glass Dimensions has in its</p>
<p style="text-align: right;">131</p> <p>1 Q. Perfectly clear, right?</p> <p>2 A. Well, it's not exactly clear, 'cause it</p> <p>3 says, "the trustee will generally receive." I</p> <p>4 don't know what that means.</p> <p>5 Q. All right. Approximately 50 percent.</p> <p>6 A. Approximately, yes.</p> <p>7 Q. Okay.</p> <p>8 MR. RUDMAN: Next. The last fund</p> <p>9 declaration. We will mark as Exhibit 11 the fund</p> <p>10 declaration for the Passive Bond Market Securities</p> <p>11 Lending Fund. Madam reporter.</p> <p>12 Q. Mr. witness, I'll put this right in front</p> <p>13 of you. All right.</p> <p>14 MR. PORTER: She has to stamp it first.</p> <p>15 (Perkins 11, SS-GD 551-554.)</p> <p>16 Q. Okay. Go to Page 3, which is SS-GD</p> <p>17 0000553. And do you see that the following</p> <p>18 language appears: "No less than 50 percent of the</p> <p>19 securities lending revenue will accrue to the</p> <p>20 benefit of the participants of the fund."</p> <p>21 Excuse me. Do you see that, sir?</p> <p>22 A. Yes.</p> <p>23 Q. Let me read the next sentence to you: "As</p> <p>24 compensation for these securities lending services</p>	<p style="text-align: right;">133</p> <p>1 possession, custody, or control pertaining to the</p> <p>2 Glass Dimensions, Inc. Profit Sharing Plan and</p> <p>3 Trust?"</p> <p>4 A. All documents other than electronic</p> <p>5 documents?</p> <p>6 Q. Uh-huh. Yes.</p> <p>7 A. What do you mean by "electronic</p> <p>8 documents"?</p> <p>9 Q. Electronic documents are things like</p> <p>10 email.</p> <p>11 A. Oh, I think we gave him everything.</p> <p>12 Q. Well, what role did you have in searching</p> <p>13 for documents?</p> <p>14 A. Not much.</p> <p>15 Q. Well, did you search your own house?</p> <p>16 A. No. I don't have any of the documents.</p> <p>17 Q. Did you search your office?</p> <p>18 A. I don't have any documents there either.</p> <p>19 Q. Well, what did you personally do to search</p> <p>20 for documents?</p> <p>21 A. I didn't do much.</p> <p>22 Q. Okay. Can you tell me, sir, how many</p> <p>23 meetings at State Street have you attended over the</p> <p>24 years?</p>

34 (Pages 130 to 133)

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